

EXHIBIT “A”

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: ASBESTOS PRODUCTS
LIABILITY LITIGATION (No. VI)**

This Document Relates to:

Herbert Pease

V.

A.W. Chesterton Co., et al.

**Consolidated Under
MDL DOCKET NO. 875**

Civil Action No. 2:09-cv-62581-ER

(transferred from
No. 1:08-cv-00624-JAP D (Del.))

DISCOVERY PLAN

Barbara Pease-Kinsey, on Behalf of the Estate of Herbert Pease, Plaintiff.

E.D. Pa Case No. 2:09-cv-62581-ER.

Transferor Case No. No. 1:08-cv-00624-JAP D (Del.)

Date claim originally filed: August 1, 2008

Plaintiff's Disease: Mesothelioma.

1. All fact discovery must be completed by: **November 4, 2009.**
2. All dispositive motions must be filed by: **December 4, 2009.**
3. Responses to dispositive motions must be filed by: **January 4, 2010.**
4. Replies to responses to dispositive motions, if any, must be filed by: **February 3, 2010.**
5. Plaintiff's expert reports must be filed by: **March 5, 2010.**

6. Defendant's expert reports must be filed by: **April 5, 2010.**
7. Rebuttal expert reports must be filed by: **May 5, 2010.**
8. Expert depositions must be completed by: **June 21, 2010.**

/s/ G. Sean Jez

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